

# Sub-Task

**Under Task Order #02 – Brownfields TBAs**

**START 4 CONTRACT #: EP-S7-13-06**

**Activity Type:** Targeted Brownfield Assessment

**Created On:** 05/18/2018

**Task:** Environmental Site Assessment

**PO:** Debra Dorsey

**Task Monitors:** Todd H. Davis,  
Randy Brown, Whitney Bynum

**General Task Description:** Phase II Environmental, ABCA,  
update Phase I ESA

**Task Codes:**

**Estimated Completion Date:** November 30, 2018

**Site/Project Name:** Holden Business Park

**Address:** 500 W McKissock St (Former Rose Chemical)

**EXT #:**7749

**City, State, Zip:** Holden, Missouri 64040

**Site ID No:** N/A

## **I. INTRODUCTION**

### **PURPOSE**

Under the authority of legislation, Presidential Directives, and promulgated regulations, EPA is responsible for protecting human health and the environment. EPA is delegated authority to undertake removal and remedial response actions.

The purpose of this Statement of Work (SOW) is for the contractor to provide EPA with technical support. For each assigned task, the contractor shall provide appropriately experienced, trained, and accredited personnel with current credentials/certifications as well as all supplies, materials, tools, and equipment necessary to complete the job.

## **II. BACKGROUND**

Under the authority of legislation, Presidential Directives, and promulgated regulations, EPA is responsible for protecting human health and the environment. EPA is delegated authority to undertake removal and remedial response actions. EPA is responsible for conducting evaluations and cleanups of uncontrolled hazardous substance disposal sites and placing those that are considered to pose a significant threat to human health or the environment on the National Priorities List (NPL). Site assessment is the first step in determining whether a site meets the criteria for placement on the NPL. Listing a site on the NPL is one tool among many that are available to EPA and state cleanup program managers to accomplish the cleanup of contaminated waste sites. For additional information, see EPA OSWER Directive 9203.1-06, "Guidance on Setting Priorities for NPL Candidates sites."

## **III. TECHNICAL REQUIREMENTS**

**EPA Targeted Brownfields Assessment  
TASK ORDER  
Holden Business Park (Former Rose Chemical)  
500 W McKissock Street  
Holden, Johnson County, Missouri 64040  
May 18, 2018**

## **IV. Introduction/Background Discussion**

The EPA's Targeted Brownfields Assessment (TBA) program is designed to assist States, tribes and local governments to minimize the uncertainties of contamination often associated with brownfields. TBAs supplement and work with other efforts under EPA's Brownfields Program to promote cleanup and redevelopment of brownfields properties.

The Johnson County Economic Development Corporation has requested EPA to perform a Phase II Environmental Site Assessment for hazardous substances, Analysis of Brownfield Cleanup Alternatives (ABCA), and update the Phase I ESA on the McHolden Business Park property located at 500 W McKissock Street, Holden, Johnson County, Missouri. The City plans to use the property as a business park.

## **V. Site Description**

The site covers approximately 26 acres and has two metal buildings.

### **Location**

The Holden Business Park site is located at 500 W McKissock Street in Holden, Missouri

## **Description and Current Conditions of Sites**

The current use is as an industrial scrap metal recycling business. Access to the site is being provided through an agreement with the property owner/applicant.

### **VI. History of Operation**

The referenced property is the Former Rose Chemical Site.

### **VII. Summary of Pertinent Previous Investigations**

A previous Phase I was conducted in 2016. EPA has records from the PRP Removal of PCB contamination at the property.

### **VIII. Scope of Work**

The contractor shall perform a Phase II Environmental Site Assessments (ESA) for hazardous substances on the Holden Business Park site. The contractor shall meet with the applicant, EPA Region 7 staff, and MDNR Staff to discuss the sites history, the Phase I and scope of the Phase II, and potential or planned future site uses. The contractor shall prepare an Analysis of Brownfield Cleanup Alternatives (ABCA). The Phase I shall be updated to include the data from the Phase II Report. The intent of the Applicant and City of Holden is to comply with the application for a Missouri Certified Site Program requirements. The Assessment and Report shall be provided in order to meet this requirement.

The Phase I ESAs will identify any potential recognized environmental conditions (REC) located on or in the vicinity of the sites in accordance with ASTM Standard E 1527-05, Standard Practice for Phase I Environmental Site Assessments. The Phase II ESAs will further assess the sites in accordance with ASTM Standard E 1903-97-11, Standard Guide for Phase II Environmental Site Assessments.

A completed Property Profile Form for each property will be submitted with the final Reports.

### **IX. Description of Tasks**

#### **ASTM/AAI Phase I and Phase II ESA and Reporting**

The contractor will conduct the Phase I ESAs in accordance with EPA's final regulations governing All Appropriate Inquiries (40 CFR 312) or ASTM International's E 1527-13 and E1903-97-11 standard for Phase I & II ESAs as well as the guidance documents listed at the end of this task order.

From the information and documents reviewed for the Phase I and Phase II ESAs and

inclusive of all EPA comments on the draft report, the contractor shall prepare 3 bound color hard copies and one electronic copy of each of the ASTM/AAI Phase I and Phase II site investigation reports covering the individual site and including a property profile form for the site. The report will detail the execution of the site inspections and summarize the findings of the site investigation. All hard copies and the electronic copy will be provided to the EPA Project Contact identified below.

#### **X. Quality Assurance Project Plan (QAPP)**

The Contractor shall prepare a Quality Assurance Project Plan for the environmental assessment. If structures are found on the properties the QAPP may include lead based paint and asbestos surveys to be performed during the Phase II Environmental Site Assessment. The QAPP shall present the objectives, organization, activities, and quality control procedures that will be employed to ensure that all technical data generated during the assessment and the asbestos and lead-based paint surveys are accurate and representative of the conditions at the project site. The QAPP shall contain a Title and Approval Page. A draft version of the QAPP shall be submitted to the EPA Task Order Project Officer (TOPO) and must be approved by the EPA TOPO prior to conducting the surveys. Electronic submittal is acceptable for the QAPP. For guidance on creating a QAPP, refer to the guide EPA Requirements for Quality Assurance Project Plans (QA/R-5) found at: <http://www.epa.gov/quality/qs-docs/r5-final.pdf>

#### **XI. Phase I Environmental Site Assessment**

The Contractor shall conduct a Phase I Environmental Site Assessment (ESA) in accordance with the American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments, E1527-13, to meet the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) “all appropriate inquiry” standard and identify all “recognized environmental conditions” associated with the property. The Phase I ESA shall be as complete as possible with all ASTM requirements attempted and documented (including title search for environmental liens, assessments of any specialized knowledge or experience of the prospective landowner, and commonly known or reasonably ascertainable information the prospective purchaser is aware of.). The Phase I ESA shall be submitted in draft and final versions.

#### **XII. Phase II Environmental Site Assessment**

The Contractor shall conduct a limited Phase II Environmental Site Assessment (ESA) in accordance with the American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments, Standard E 1903-97-11, Standard Guide for Phase II Environmental Site Assessments, to meet the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) “all appropriate inquiry” standard. The Phase II ESA shall be submitted in draft and final versions.

#### **XIII. Asbestos Containing Materials (ACM) Survey**

The Contractor may conduct an Asbestos Survey on the building. Personnel conducting the asbestos inspection shall be licensed. The asbestos survey, if necessary, shall be conducted in accordance with the protocols established by EPA regulation 40 CFR 763, the Asbestos Hazard Emergency Response Act (AHERA). Inspectors shall be properly attired and shall use wet sampling methods as applicable to reduce the potential for fiber release. Inspectors shall visually assess the interior and exterior of the building to identify homogeneous areas of materials suspected to contain asbestos. A physical assessment of each homogeneous area of suspect ACM shall be conducted to assess the condition of the material as friable or non-friable as classified by NESHAP, i.e. Friable, Non-friable Category I or Non-friable Category II. Based on results of the visual assessment, bulk samples of suspect ACM shall be collected. Samples shall be placed in sealable containers and labeled with unique sample numbers using indelible marker. Samples shall be submitted under chain of custody procedures to a Licensed and NVLAP accredited laboratory for analysis by Polarized Light Microscopy (PLM). A representative number of samples with low asbestos results (less than 3 percent) shall be analyzed by Point Count. Each homogeneous area shall be identified and noted as such in the field notes, and location where the sample is taken shall be identified at the location of the sampled item using a label, or permanent marker. The Inspector shall photograph each sample location and shall show location on a sketch or drawing. The Inspector shall estimate the quantity (e.g., sq. ft., linear feet, each) of each building component containing ACM. All investigative derived waste shall be collected and removed from the building and disposed of according to current regulations.

#### **XIV. Asbestos Survey Report**

The results of the survey must be documented in a report signed by the licensed asbestos inspector. There are no known as-built drawings, renovation records, etc., of the buildings so the inspector must prepare a floor plan sketch or drawing to record sample locations. At a minimum, the sketch shall include outside dimensions in feet. The report shall include the sketch or drawing showing sample locations, photo of sampled area, presentation of test results, friable category, copies of the lab report, and estimated quantities. The report shall also provide rough order of magnitude cost estimates for asbestos abatement (that will be used for budgetary planning). The abatement costs should be sufficiently detailed to show quantity and how costs were derived. The Asbestos Survey Report shall be combined with the Lead-Based Paint Survey Report with combined cover page titled, "Targeted Brownfields Assessment Survey Reports for Asbestos Containing Materials and Lead-Based Paint at (Name of Site)".

#### **XV. Lead-Based Paint Survey**

The Contractor may conduct a lead-based paint survey on the buildings in accordance with H.U.D. guidelines. The LBP survey, if necessary, shall be conducted by a licensed lead inspector. Screening of painted surfaces on the interior and exterior of the buildings shall be conducted using a portable X-Ray Fluorescence (XRF) analyzer. Standard operating procedures for the instrument shall be followed.

## **XVI. Lead-Based Paint Survey Report**

The results of the survey must be documented in a report signed by the licensed lead inspector. All test readings shall be reported including negative and inconclusive readings. A building sketch shall be included showing general locations of LBP materials and photos shall be provided. Approximate quantities of LBP materials shall be provided. The report shall also provide rough order of magnitude cost estimates for lead abatement (that will be used for budgetary planning). The abatement costs should be sufficiently detailed to show quantity and how costs were derived. The Lead-Based Paint Survey Report shall be combined with the Asbestos Survey Report.

## **XVII. Project Schedule**

The contractor will submit to the EPA Project Contact identified below an electronic copy of a 90% draft submittal of the site investigation reports within 60 days from the date the sites are assigned to the contractor.

Comments will be made and returned to the contractor within 60 business days.

The final deliverables as described above are due 30 business days after EPA provides comments on the draft reports.

## **XVIII. 8. Project Contacts**

Todd H. Davis, Site Assessment Manager, EPA Region 7

Phone: 913-551-7749

Email: davis.toddh@epa.gov

Address: US EPA Region 7

Todd H. Davis

11201 Renner Blvd

Lenexa, KS 66219

### **Guidance Documents/References**

- “Standard Practice for Environmental Site Assessment: Phase I Environmental Site Assessment Process,” ASTM, E 1527-13

- “Standard Practice for Environmental Assessments: Phase II Environmental Site Assessment Process,” ASTM 1903-97; and

- “Generic Quality Assurance Project Plan for the Superfund Site Assessment and Targeted Brownfields Assessment Programs,” EPA-Region VII, Superfund Division, July 2007

## **XIX. DOCUMENTATION REQUIREMENTS**

In the course of performing tasks identified in this SOW, the contractor shall submit all analyses, options, recommendations, reports, and any other work products in draft form for review by the Contracting Officer (CO) or the

Contracting Officer's Representative (COR) prior to use or distribution.

The contractor shall not publish, release, use, or disclose any work product generated under this SOW without EPA's written approval; interpret EPA policies or regulations when conducting any training, seminars, or presentations; and/or provide any legal advice or legal interpretations.

The Government will make all final regulatory, policy, and interpretative decisions resulting from contractor provided advice and assistance; and will also make all final decisions regarding compliance determinations, or the violations of an order, law, regulation, etc.

The contractor shall submit documents that demonstrate a good command and correct usage of the English language (e.g, discussion of facts flow in a coherent and organized manner); use proper grammar (noun and verb tense correspond, etc.); and are free of incomplete sentences and misspelled words.

For deliverables that contain recommendations, the contractor shall explain or rank policy; explain or rank alternative actions; describe procedures used to arrive at recommendations; summarize the substance of deliberation; report any dissenting views; and cite sources relied upon.

<b>Deliverable/Activity</b>	<b>Due Date</b>
Conference Call with Applicant and EPA	6/5/2018
Site Visit	6/10/2018
QAPP	6/15/2018
Field Work	8/15/2018
Draft Phase II Report	10/1/2018
Final Phase II Report/ABCA	11/30/2018